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10 UNITED STATES DISTRICT COURT
11
12 NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

13 JANE DOE, individually and on behalf of all
14 others similarly situated,

15 Plaintiff,

16 vs.

17 YOUTUBE, INC.,

18 Defendant.

Case No. 4:20-cv-7493-YGR

**[PROPOSED] ORDER GRANTING
DEFENDANT YOUTUBE, LLC'S
MOTION TO DISMISS**

1 Defendant YouTube, LLC's Motion to Dismiss having come for hearing on January 26,
2 2021, and considering all arguments in support of and in opposition to the motion, the Court hereby
3 orders:

4 1. Plaintiff Jane Doe's first claim for Negligence (Abnormally Dangerous Activity) is
5 dismissed [with/without] prejudice for failure to state a claim under Federal Rule of Civil Procedure
6 12(b)(6).

7 2. Plaintiff Jane Doe's second claim for Negligence (Negligent Exercise of Retained
8 Control) is dismissed [with/without] prejudice for failure to state a claim under Federal Rule of Civil
9 Procedure 12(b)(6).

10 3. Plaintiff Jane Doe's third claim for Negligence (Negligent Provision of Unsafe
11 Equipment) is dismissed [with/without] prejudice for failure to state a claim under Federal Rule of
12 Civil Procedure 12(b)(6).

13 4. Plaintiff Jane Doe's fourth claim for violation of California's Unfair Competition
14 Law is dismissed [with/without] prejudice for failure to state a claim under Federal Rule of Civil
15 Procedure 12(b)(6).

16 5. Plaintiff Jane Doe's fifth claim for violation of California's Unfair Competition Law
17 (as "Special Employer") is dismissed [with/without] prejudice for failure to state a claim under
18 Federal Rule of Civil Procedure 12(b)(6).

19 **SO ORDERED.**

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21 DATED: _____

22 Hon. Yvonne Gonzalez Rogers
23 United States District Judge
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